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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF VIOLA TREBICKA
IN SUPPORT OF DEFENDANT GOOGLE
LLC'S ADMINISTRATIVE MOTION TO
SEAL OPPOSITION TO PLAINTIFFS'
MOTION TO COMPEL REGARDING
DISPUTE P3**

Referral: Hon. Susan van Keulen, USMJ

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make this
4 declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could
5 and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Defendant
7 Google LLC’s Administrative Motion To Seal Opposition To Plaintiffs’ Motion To Compel
8 Regarding Dispute P3 (“Opposition”). In making this request, Google has carefully considered the
9 relevant legal standard and policy considerations outlined in Civil Local Rule 79-5. Google makes this
10 request with the good faith belief that the information sought to be sealed consists of Google’s
11 confidential and proprietary information and that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the Opposition,
13 attached hereto as Exhibit A, and corresponding Exhibit 1, attached hereto as Exhibit C.

14 4. The information requested to be sealed contains Google’s highly confidential technical
15 information regarding the various types of Google’s internal identifiers/cookies and their proprietary
16 functions, that Google maintains as confidential in the ordinary course of its business and is not
17 generally known to the public or Google’s competitors.

18 5. Such confidential information reveals Google’s internal strategy and system design
19 regarding various important products, and falls within the protected scope of the Protective Order
20 entered in this action. *See* Dkt. 81 at 2-3.

21 6. Public disclosure of such confidential information could affect Google’s competitive
22 standing as competitors may alter their identifier system designs and practices relating to competing
23 products. It may also place Google at an increased risk of cyber security threats, as third parties may
24 seek to use the information to compromise Google’s identifier systems.

25 7. For these reasons, Google respectfully requests that the Court order the identified
26 portions of the Opposition to be sealed.

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1 I declare under penalty of perjury of the laws of the United States that the foregoing is true and
2 correct. Executed in Los Angeles, California on June 30, 2021.

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4 DATED: June 30, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

5
6
7 By 

Viola Trebicka

Attorney for Defendant